

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE POKÉMON COMPANY  
INTERNATIONAL, INC., a Delaware  
corporation,

Plaintiff,

v.

BRYAN GARCIA CRUZ, an individual,  
and DAVID ANDINO MAISONAVE, an  
individual,

Defendants.

No. 19-cv-1911MJP

PLAINTIFF'S MOTION TO REOPEN FOR  
LIMITED PURPOSE OF ENTERING  
STIPULATED PERMANENT  
INJUNCTIONS AND JUDGMENTS

NOTE ON MOTION CALENDAR:  
June 11, 2021

Plaintiff The Pokémon Company International, Inc. ("TPCi") moves to reopen the above-captioned case for the limited purpose of submitting the stipulated injunctions and stipulated judgments to the Court, attached hereto as Exhibits 1 and 2.

On May 3, 2021, the TPCi and Defendant David Andino Maisonave notified the Court that they had reached a settlement in this matter. Dkt. No. 44. The following day, TPCi and Defendant Brian Garcia Cruz notified the Court that they too had reached a settlement in principle. Dkt. No. 45. The Court then dismissed this action with prejudice, but provided that "[i]n the event that settlement is not perfected, any party may move to reopen the case, provided that such motion is filed within" thirty days of this order. Dkt. No. 47. On June 3, 2021,

PLAINTIFF'S MOTION TO REOPEN FOR  
LIMITED PURPOSE (No. 19-cv-1911MJP) – 1

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1 Plaintiffs moved to extend the deadline to reopen the case, or in the alternative to reopen the case  
 2 in order to have additional time to execute the settlement documents. Dkt. No. 48. That motion  
 3 is noted on the calendar for June 11, 2021. *Id.* Since Plaintiff's June 3 motion, the parties have  
 4 executed the settlement documents and fulfilled the required initial terms of those agreements.

5 TPCi therefore respectfully requests that this Court grant its motion to reopen the case to  
 6 enter the stipulated injunctions and stipulated judgments. Upon the entry of the stipulation  
 7 injunctions and stipulated judgments, the case will be dismissed against all defendants with  
 8 prejudice.

9  
 10 DATED: June 10, 2021

11  
 12 By: s/Jacob P. Dini

13 Lauren W. Staniar, WSBA No. 48741

14 Jacob P. Dini, WSBA No. 54115

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22 *Attorneys for Plaintiff, The Pokémon*  
 23 *Company International, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that they served a copy of the foregoing Motion to Reopen for Limited Purpose of Entering Stipulated Permanent Injunctions and Judgments to the following via U.S. Mail, postage prepaid, before the hour of 5:00 pm, on June 10, 2021:

Bryan Garcia Cruz  
5509 Legacy Crescent Pl., Unit 302  
Riverview, FL 33578-2818

David Andino Maisonave  
221 W Laurel Street  
Willard, OH 44890-1342

*s/Jenna DeRosier*

Jenna DeRosier  
Legal Assistant